# BRAMMER® MANUFACTURING COMPANY

P.O. Box 3547 • Davenport, Iowa 52808 • (319) 326-2585 • Fax (800) 334-7230

# Living Kitchens

April 7, 1995

RECEIVED

APR 08 1995

**IOWA SECTION** 

Mr. Lyndell Harrington Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII 726 Minnesota Ave. Kansas City, Kansas 66101

Dear Mr. Harrington:

In response to the Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act received by Brammer Manufacturing Company (EPA ID Number IAD005264940), 1441 Rockingham Road, Davenport, IA 52802, from David N. Whiting, on March 10, 1995, I can report the following corrective actions taken as a follow up to my letters of March 17, 1995 and March 24, 1995:

- 1. "40 CFR 262.11 Inadequate hazardous waste determination on:
  - Cardboard on spray line."
  - 2. Brammer contacted an outside lab to make the hazardous waste determination on the cardboard. The lab report is attached and shows that the material is not hazardous waste. Brammer will properly dispose of this material.
- 9. "40 CFR 265.52(c) Inadequate contingency plan description of arrangements with local authorities."
- 10. "40 CFR 265.52(d) Inadequate emergency coordinator list information."
- 11. "40 CFR 265.52(e) No emergency equipment list & description in contingency plan.

9.

11. I have attached Brammer's new contingency plan which I believe meets the requirements. I have marked the margins of the contingency plan to help highlight the relevant text.

In summary, Brammer feels we have properly addressed the above violations by April 15, 1995 as I committed Broffing PY letters of March 17, 1995 and March 24, 1995.

Document #

RCRA RECORDS CENTER

AI

We continue to work hard to improve our waste handling procedures. Since my last letter, we decided to place a phone closer to our hazardous waste accumulation drum. This phone is about 30 feet from the drum and visible from the drum. We feel this is an improvement to our earlier response to "40 CFR 265.34 Inadequate access to alarm or communication device at container storage areas."

Sincerely,

BRAMMER MANUFACTURING COMPANY

Chip Hawkinson

Quality Control Manager/Safety Director

cc Mr. Terry Dickey, Brammer Manufacturing Company

# BELING CONSULTANTS

# LABORATORY REPORT

April 7, 1995

# Professional Planning and Engineering • Environmental Laboratory

Mr. Chip Hawkinson Brammer Manufacturing P.O. Box 3547 Davenport, Iowa 52808

Lab No. 69039

Received: March 17, 1995

Collection Point: Brammmer Manufacturing Sample Description: Honeycomb Paint Pads

	TCLP	RCRA
	Concentration	Limits
	mq/L	mg/L
Arsenic	<0.002	5.0
Barium	1.2	100
Cadmium	0.011	1.0
Chromium, Total	<0.05	5.0
Lead	0.1	5.0
Mercury	<0.0005	つ. 2:
Selenium	<0.002	1.0
Silver	0.02	5.0
Benzene	<0.05	0.5
Carbon Tetrachloride	<0.05	0.5
Chlorobenzene	<0.05	100
Chloroform	<0.05	6.0
1,2-Dichloroethane	<0.05	0.5
1,1-Dichloroethylene	<0.05	0.7
Methyl Ethyl Ketone	0.1	200
Tetrachloroethylene	<0.05	0.7
Trichloroethylene	<0.05	0.5
Vinyl Chloride	<0.1	0.2
Cresols (0,M,& P)	<0.1	
1,4-Dichlorobenzene	<0.1	7.5
2,4-Dinitrotoluene	<0.1	0.13
Hexachlorobenzene	<0.1	0.13
Hexachlorobutadiene	<0.1	0.5
Hexachloroethane	<0.1	3.0
Nitrobenzene	<0.1	2.0
Pentachlorophenol	<0.5	100
Pyridine	(0.5	5.0
2,4,5-Trichlorophenol	<0.1	400
2,4,6-Trichlorophenol	<0.1	2.0

fax 326-0144

Moline · Chicago · Joliet · Peoria · Beloit · Davenport · Columbus

Jeffon a. Wasson

#### EMERGENCY RESPONSE PLAN/CONTINGENCY PLAN 1441 ROCKINGHAM ROAD BRAMMER MANUFACTURING COMPANY Davenport, IA

#### PURPOSE OF THE EMERGENCY ACTION PLAN:

The purpose of the Emergency Action Plan is to comply with OSHA standard 29CFR 1910.1200, with Title III SARA regulations, with EPA 40 CFR 265.52, and provide advance information and give direction to all employees for emergencies BEFORE they arise. All employees are required to become familiar with the provisions of this Emergency Response Plan.

Brammer Emergency Response Coordinator, Primary:

(Work)..... 319-326-2585 ext. 303 Chip Hawkinson (Work)..... Page 87 (Work)..... Page 76 2105 E. 46th St., Davenport, IA (Home) ..... 319- 359-9707 Back up Emergency Response Coordinators become the Emergency Response Coordinator in case of absence: Brammer Emergency Response Coordinator, First Backup: Steve Shea (Work) ...... 319-326-2585 ext. 306 (Work) ..... Page 87 (Work) ..... Page 76 722 N. Moselle, Blue Grass, IA (Home) ...... 319-381-3568 Brammer Emergency Response Coordinator, Second Backup: Bob West (Work) ..... 319-326-2585 ext. 231 (Work) ..... Page 76

The primary emergency coordinator may be contacted for information about this plan. The emergency coordinator and his alternates must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan.

21669 235th Ave., Le Claire, IA (Home) ..... 319- 289-3067

(Work) ..... Page 87

THE EMERGENCY RESPONSE COORDINATOR HAS ALL THE AUTHORITY AND RESPONSIBILITY TO MEET THE REQUIREMENTS OF THE ABOVE LISTED FEDERAL CODE, INCLUDING:

- Determine whether an emergency requiring activation of emergency procedures exists or is imminent.
- 2. Direct the Fire Brigade and all Brammer Employees.

- 3. Direct and coordinate evacuation, sheltering and accounting of personnel.
- 4. Direct shutdown of production, warehouse and office operations as deemed necessary.
- 5. Provide security for the buildings and contents.
- 6. Authorize re-entry of employees into company buildings. Ensure that all listed emergency equipment is cleaned and fit for use before operations are resumed.
- 7. Commit the resources needed to carry out this plan and direct Brammer's emergency activities with authorities and contractors.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited types of materials being handled at Brammer, he or she may do this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g. the effects of any toxic, irritating, or asphyxiation gases that may be generated, or the effects of any hazardous run-off.

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities. He must be available to help officials decide whether local areas should be evacuated: and
- b. The coordinator must immediately notify the National Response Center at 800-424-8802. The report must include:
  - 1. Name and telephone number of reporter;
  - Name and address of facility;
  - 3. Time and type of incident (e.g., release, fire):
  - Name and quantity of material(s) involved, to the extent known;
  - 5. The extent of injuries, if any; and

The possible hazards to human health, or the environment, outside the facility.

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, wherever this is appropriate.

Immediately after an emergency, the emergency coordinator must provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

The emergency response coordinator must ensure that in the affected areas of the facility:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with 265.52 (h) before operations are resumed in the affected area(s) of the facility.

Within 15 days after the incident, the owner or operator must submit a written report on the incident to the Regional Administrator, the report must include:

- Name, address and telephone number of the owner or a. operator;
- Name, address, and telephone number of the facility;
- Date, time and type of incident (e.g. fire, c. explosion);
- Name and quantity of material(s) involved; d.
- The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. Estimated quantity and disposition of recovered material that resulted from the incident.

This contingency plan must be reviewed, and immediately amended, if necessary, whenever:

- a. Applicable regulations are revised;
- b. The plan fails in an emergency;
- c. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- d. The list of emergency coordinators changes; or
- e. The list of emergency equipment changes.

#### EMERGENCY ACTION PLAN - FIRE:

Fire is our greatest hazard. Particularly hazardous are our flammable, organic solvent based finishing materials.

- 1. Immediately report a fire or other emergency to your supervisor so that an orderly activation of the emergency action plan can be made and the Emergency Response Coordinator notified. Pull any fire alarm switch to sound the fire evacuation siren and automatically signal Per Mar.
- 2. Fire brigade members may use a fire extinguisher if trained in its use and if the fire is considered small enough to be safely extinguished, otherwise they must evacuate the premises.
- 3. Fire Brigade Members will carry out their assigned duties if safe to do so.

#### EMERGENCY ESCAPE PROCEDURES AND ROUTES:

EMERGENCY EXITS FOR EVACUATION AND DEPARTMENTAL MEETING POINTS ARE SHOWN ON THE ATTACHED FACILITIES LAYOUT OR FIRE BRIGADE ROSTERS. Immediately leave the building through the nearest available exit and meet at the Rockingham Road side of the building in your assigned departmental groups. Familiarize yourself with the location of all emergency exits BEFORE the time comes to use them.

#### EMERGENCY ACTION PLAN - TORNADO

1. When a "Tornado Watch" is issued by the U.S. Weather Service, it will be received by the special weather radio located in the main plant office. The Emergency Response Coordinator will listen for weather condition updates. Production will continue. Employees will be told of the watch and reminded what to do if there is a warning. If the "Tornado Watch" becomes a "Tornado Warning", the Emergency Response Coordinator will announce the "Tornado Warning" and direct employees to

congregate in the three story building at 1441 away from windows and racks. No one will be allowed to leave the building until the Emergency Response Coordinator issues the "All Clear".

#### EMERGENCY ACTION PLAN - SMALL HAZARDOUS SPILL

- Α. Small spills are five gallons or less. Small spills must be reported to the Emergency Response Coordinator.
- В. Immediate clean up must be accomplished to reduce safety hazards and to prevent spreading.
- Use gloves, respirators (if trained and authorized), boots or other protective equipment as needed.
- D. Use absorbent. (Dirty stain wiping rags, clean wiping rags, sawdust, oil dry)
- E. Activate ventilation system.
- If material is flammable or combustible, bring a fire F. extinguisher, all necessary fire brigade members into the area. Keep sources of ignition away.
- G. Turn off any equipment which might be reached by the spilled material.
- Н. Scoop up the spilled material with cardboard or a shovel and put into a proper waste receptacle. Appropriately handle those materials classified as hazardous waste.
- Wipe up with rags. Place used rags in a proper dirty rag container.
- J. Mop up with appropriate cleaning solution if necessary.
- Κ. Use water, non-combustible or non-flammable solvents for clean up whenever possible.
- Flammable solvent used for clean up must be kept in approved safety containers.
- Any mops used with flammable or combustible material must be cleaned, wrung out and hung up to dry in a well ventilated area away from any source of heat, flame or spark.

#### EMERGENCY ACTION PLAN - LARGE HAZARDOUS SPILL

- A. Large spills are over five gallons. Large spills must be reported to the Emergency Response Coordinator.
- B. Flammable spills of more than one drum, or that are at unusual risk of fire, explosion, or location, must be handled by the Davenport Fire Department. Activate the Emergency Response system.
- C. Shutdown and/or remove from the area any operations which might generate heat or sparks or cause congestion. Remove employees who are not involved in the clean up.
- D. Immediate clean up must be accomplished to reduce the safety hazard and prevent spreading.
- E. Notify supervisors through out the plant about the spill as a need to evacuate the plant could develop.
- F. If material is flammable or combustible, bring the necessary fire extinguishing equipment and fire brigade members to the area.
- G. Activate ventilation system if available. Insure adequate movement to the outside with approved fans or open doors or windows if necessary.
- H. Use gloves, respirators (if trained and authorized), boots and other personal protective equipment as necessary.
- I. Use absorbent. (Dirty stain wiping rags, clean wiping rags, sawdust, oil dry)
- J. Scoop up the spilled material with cardboard or a shovel and put into a proper waste receptacle. Appropriately handle those materials classified as hazardous waste.
- K. Mop up with appropriate cleaning solution, as needed.
- L. Wipe up with rags and dispose of rags properly.
- M. Use water, non-combustible or non-flammable solvent for clean up whenever possible.
- N. If flammable or combustible solvent must be used for mopping (do not flood area), use the smallest quantity possible, but not to exceed 75 square feet wet for combustible solvents and 25 square feet for flammable solvents. It may be necessary to restrict these areas depending on the adequacy of ventilation and the fire and health hazards.

#### EMERGENCY ACTION PLAN - POWER FAILURE

Evacuate the building if emergency lighting is adequate or stay in place until guided out. Fire alarms will not work. Phones may not work. Fax and TDD phones may work when others do not. Account for employees.

#### EMERGENCY ACTION PLAN - FLOOD

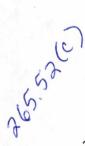
A flood should be predicted in adequate time for us to study our flood plan and prepare.

#### ARRANGEMENTS WITH LOCAL AUTHORITIES AND CONTRACTORS

- 1. The Davenport Fire Department is our primary emergency responder. When the Fire Department responds to the emergency call, they take complete charge of all fire fighting, first aid, spill control, and rescue operations. Please follow their directions and remain clear of emergency equipment and personnel. The Davenport Fire Department has been familiarized with our facilities through annual fire inspections, a separate Hazmat inspection, and copies of this plan.
- 2. The Davenport Police Department provides the enhanced 911 emergency service, and is the primary emergency police authority for Brammer.
- 3. We have an agreement with Per Mar Security to provide alarm services and security. They have been provided a copy of this plan.
- 4. We have a letter of intent from Environmark to respond to emergency situation potentially occurring at Brammer.
- 5. Genesis Medical Center provides around the clock emergency room services. They have been provided a copy of this plan.

#### OTHER EMERGENCY PROCEDURES

- 1. Evacuated employees are not permitted re-entry to company facilities unless and until permission is obtained from the Fire Department and the Company's Emergency Response Coordinator. Employees may not leave a safe meeting point until accounted for and dismissed by the Emergency Response Coordinator or the Fire Department.
- 2. Effective security procedures such as cordoned off areas will prevent unauthorized access and protect vital records and equipment. It is the responsibility of the Emergency Response Coordinator to see that proper security precautions be provided to the facilities,



including off-site or safe back-up locations for essential personnel records, accounting files, legal documents and lists of employees' relatives to be notified in case of emergency. Per Mar will respond to alarms.

Only Brammer's designated public contact, Hank Braunlich, President, may make statements to the press.

#### EMPLOYEE TRAINING:

- Every employee must know the details of the emergency action plan. New employees will be informed during their indoctrination. Additional training will be provided when new equipment, materials, or processes are introduced, when procedures have been updated or revised, or when emergency action plan exercises show that employee performance is inadequate.
- The Emergency Action Plan will be reviewed and tested at 2. least annually.
- First aid supplies for trained persons to use and emergency telephone numbers will be placed near telephones.
- A buddy and back up will be assigned to each disabled employee. Signals and evacuation methods will be worked out to the satisfaction of the disabled employee and management between the buddy and the disabled employee for each emergency.
- Notify your supervisor of any injury or of a fellow 5. worker's serious injury or illness. The supervisor will notify Personnel (or other trained First Aid provider). The supervisor or First Aid Provider will decide whether to call an ambulance (9-911) and will assign people to guide emergency crews and to keep away on lookers.

#### EMERGENCY EQUIPMENT

- The facility is provided with an automatic sprinkler system.
- 2. Per Mar Security monitors the automatic sprinkler alarms and the fire alarms. Fire alarm pull stations are marked on the facility layouts and sound a general evacuation siren.
- 3. All telephones may be used to summon outside emergency assistance (dial 9-911). Telephone locations are marked on the facility layouts.
- 4. The public address (or page system) may be used as an

internal alarm and may be used to signal a full or partial evacuation, summon spill responders, or other emergency notices. The page system may be accessed by all phones except the fax and TDD phones.

- We have fire extinguishers for use by trained and authorized employees. Fire extinguisher locations are marked on the facility layouts.
- We have four emergency spill kits with personal protective equipment, absorbents, scoops, brooms and wipes which are each capable of handling about 30 gallons of spilled liquid. The kit locations are marked on the facility layouts.

#### FIRST FLOOR FIRE BRIGADE ASSIGNMENTS

EMERGENCY RESPONSE COORDINATOR-QC MANAGER CHIP HAWKINSON BACK UP COORDINATOR-Production Manager STEVE SHEA Then Foreman, BOB WEST

FIRE BRIGADE MEMBERS WILL CARRY OUT THEIR ASSIGNED DUTIES ONLY IF SAFE TO DO SO, THEN REPORT TO THEIR BOSS AT THE MEETING AREA.

#### MEETING AREA - Northeast corner of building, in visitor's parking

	visitor s parking
1.	Check main valve, direct fire trucks LARRY CATO
2.	See that fire alarm is sounded; Report Location of fire to the Emergency Response Coordinator; account for department's employees and report  LES PETERS
3.	Call Fire Department, distribute attendance rosters
4.	Shutdown air compressors and gas fired air replacement unit BILL DOBBS
5.	Shutdown exhaust system, air makeup unit and assist with closing fire doors and windows LINDA FISHER
6.	Close windows and fire doors

- Close windows and fire doors..... BARB MEYER
- 7. Close the north west overhead fire door....... ···· BOB WOODS
- Back up person to fill in during absence of fire brigade member or assist with closing of doors and windows ..... LAWSON RUSHTON

#### ALL OTHER EMPLOYEES

Turn off your machine, if safe to do so, then exit building immediately - meet in front of the building at the northeast corner in visitors parking.

#### 2ND FLOOR FINISH DEPARTMENT (INCLUDING 3RD FLOOR) FIRE BRIGADE ASSIGNMENTS

EMERGENCY RESPONSE COORDINATOR-QC MANAGER CHIP HAWKINSON BACK UP COORDINATOR-Production Manager STEVE SHEA Then Foreman, BOB WEST

FIRE BRIGADE MEMBERS WILL CARRY OUT THEIR ASSIGNED DUTIES ONLY IF SAFE TO DO SO, THEN REPORT TO THEIR BOSS AT THE MEETING AREA:

#### MEETING AREA - In front of building facing Rockingham Road

- 1. See that fire alarm is sounded and report fire location to the Emergency Coordinator ...... ..... BEN HENSLER
- Turn off conveyor system and air makeup unit ...... ..... DENNIS REYNOLDS
- Close elevator doors and windows..... HERB TEGTMEIER 3.
- Turn off air make up, close elevator doors, and close south and west side windows on 3rd... PAM WEST
- 5. Close north and east side windows and stairwell windows..... ROBIN GULDENPFENNIG
- Back up person to fill in during the absence of fire brigade member or assist with closing of doors and windows..... SHARON WESCOM
- 7. Account for department's employees and report to Emergency Response Coordinator ..... BEN HENSLER

#### ALL OTHER EMPLOYEES:

Turn off your spray booth or other machine, if safe to do so, then exit building immediately -Meet in front of building facing Rockingham Road.

#### FLAT LINE FINISH DEPARTMENT FIRE BRIGADE ASSIGNMENTS

EMERGENCY RESPONSE COORDINATOR-QC MANAGER CHIP HAWKINSON BACK UP COORDINATOR-Production Manager' STEVE SHEA Then Foreman, BOB WEST

FIRE BRIGADE MEMBERS WILL CARRY OUT THEIR ASSIGNED DUTIES ONLY IF SAFE TO DO SO, THEN REPORT TO THEIR BOSS AT THE MEETING AREA.

#### MEETING AREA - In front of shipping area facing Rockingham Road.

- 1. Shut off exhaust system. Close electric overhead doors ..... SHANE MEADOR
- Close overhead doors in front of the building ..... JEFF SMITH
- Close the chute fire door ..... SANDY GIBSON 3.
- 4. Shutdown new finish line..... BRUCE MENNEKE ..... RANDY LINEBURG
- Account for department's employees and report to the 5. Emergency Response Coordinator ..... MIKE FOX
- 6. Back up person to fill in during absence..... ..... TRAVIS LEIBOLD

#### ALL OTHER EMPLOYEES:

Turn off your machinery, if safe to do so, then exit building immediately. Meet in front of shipping area facing Rockingham Road.

#### NIGHT SHIFT 1441 ROCKINGHAM ROAD FIRE BRIGADE ASSIGNMENTS

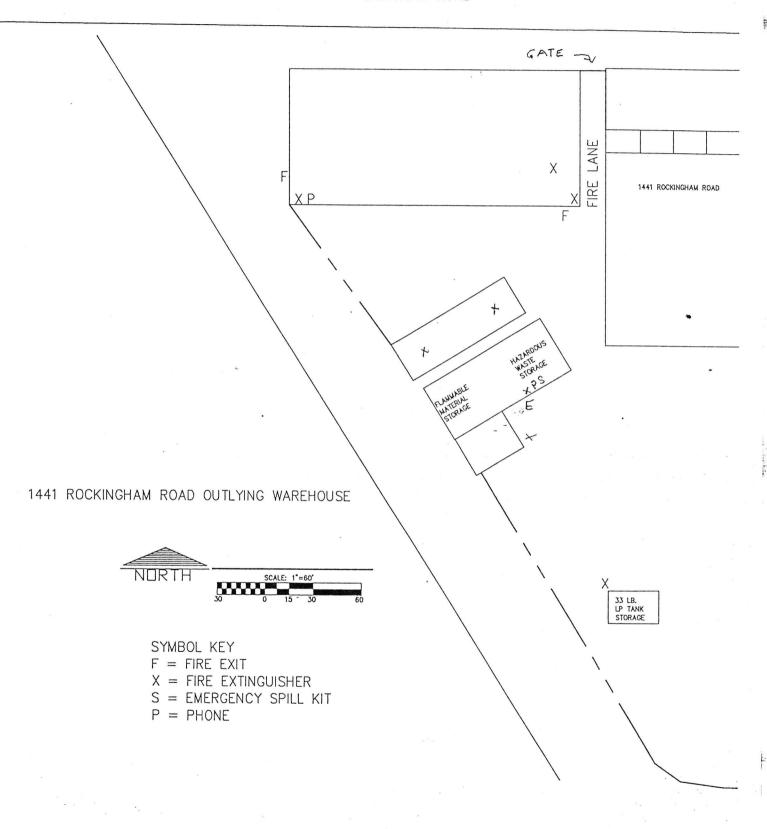
EMERGENCY RESPONSE COORDINATOR-QC MANAGER CHIP HAWKINSON BACK UP COORDINATOR-Production Manager STEVE SHEA Then Foreman, BOB WEST

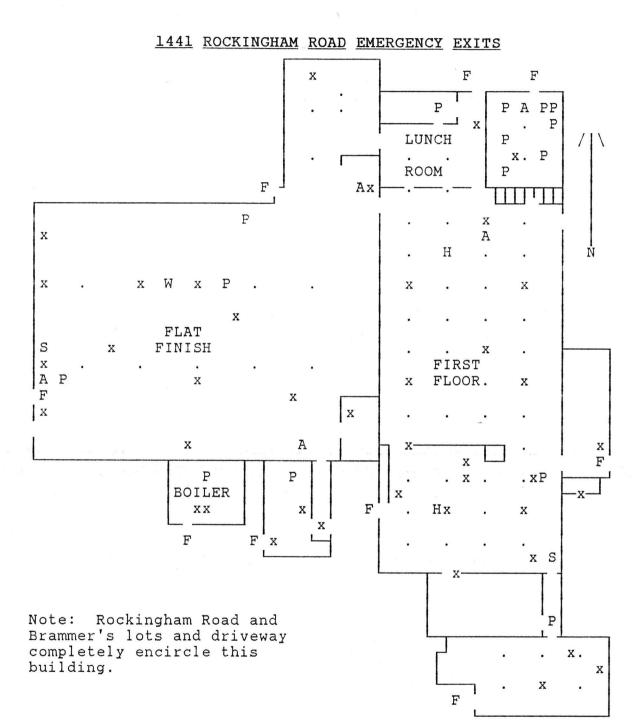
FIRE BRIGADE MEMBERS WILL CARRY OUT THEIR ASSIGNMENT ONLY IF SAFE TO DO SO, THEN REPORT TO THEIR BOSS AT THE MEETING AREA.

## MEETING AREA - In front of building - Northeast Corner

- Call fire department and report location of fire. See that fire alarm is sounded ....... ..... NIGHT SHIFT LEADMAN
- Check main valve 1st Floor Front... LARRY FERRELL 2.
- Unlock gates for fire trucks..... PER MAR
- Close windows and fire doors..... BALANCE OF CREW 4.
- 5. Turn off air compressor ...... TIM BEDWELL
- Account for department's employees and report to Emergency Response Coordinator . NIGHT SHIFT LEADMAN
- 7. Post guards to prevent unauthorized entry ...... ..... NIGHT SHIFT LEADMAN
- 8. Back up person to fill in during absence ...... ..... TIM BEDWELL

Exit the building and meet in front of the building facing Rockingham Road.





#### Key:

F Fire exit

A Alarm box

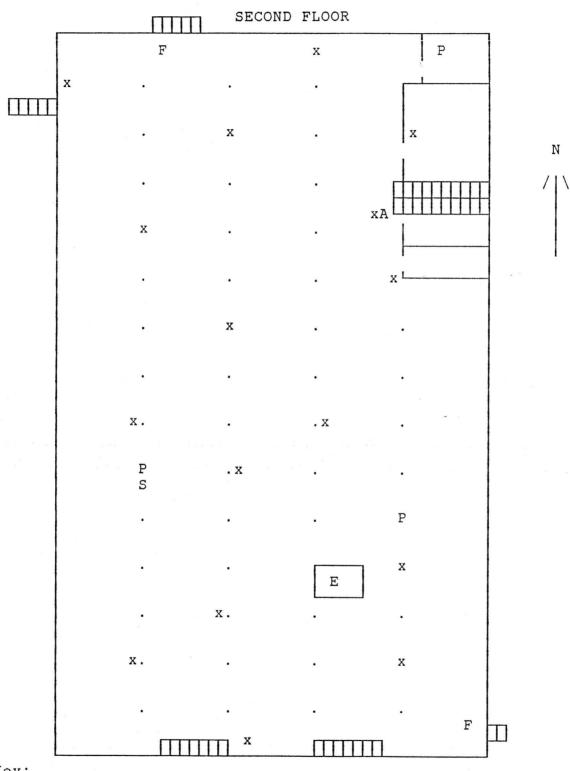
. post

X fire eXtinguisher

S emergency Spill kit

P Phone

W hazardous Waste storage



Key:

Α

F

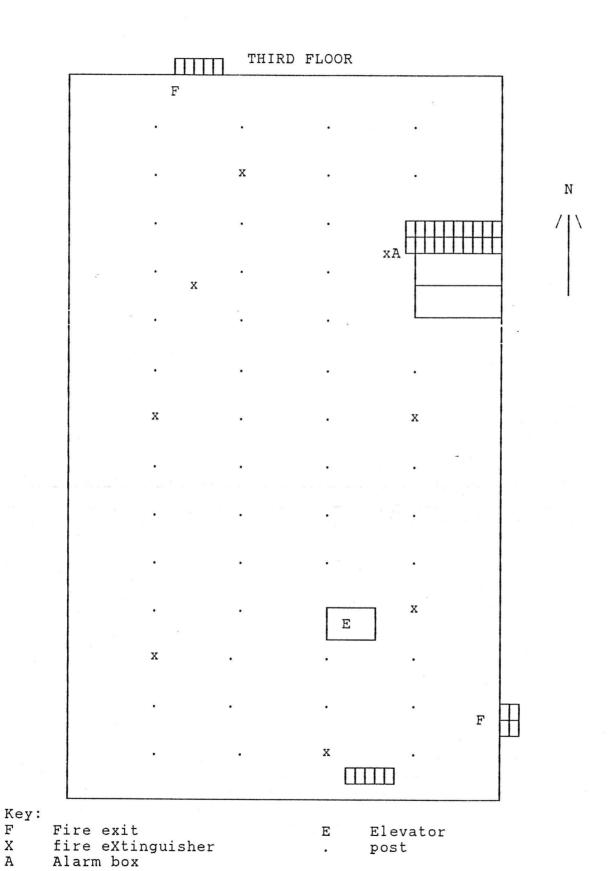
Fire exit fire eXtinguisher X Alarm box

Elevator E

Phone

s

post Spill kit



Emergency Response Plan/ch, Revision 8, April 5, 1995 Page 17

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## EMERGENCY PHONE NUMBERS

### BRAMMER MANUFACTURING CO.

P.O. BOX 3547 DAVENPORT, IOWA 52808

Thank you for using Return Receipt Service.

ls your <u>RETURN ADDRESS</u> completed on the reverse side?







First Class Mail



Mr. Lyndell Harrington Chief, RCRA Branch, U. S. Environmental Protection Agency Region VII 726 Minnesota Ave. Kansas City, Kansas 66101